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July 7, 2015

VIA ECF AND HAND DELIVERY

Honorable Victor Marrero
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Suite 660
New York, New York 10007-1312

Re: *In re MF Global Holdings Ltd. Sec. Litig.*,
(DeAngelis v. Corzine, et al., No. 11-cv-7866-VM)

Dear Judge Marrero:

We represent the Virginia Retirement System and Her Majesty the Queen in Right of Alberta, the Court-appointed lead plaintiffs (“Lead Plaintiffs”) in the above-captioned matter (the “Securities Action”). On April 20, 2015, this Court entered an order preliminarily approving Lead Plaintiffs’ proposed settlement with PricewaterhouseCoopers LLP (the “PwC Settlement”) and approving the manner for providing notice of the PwC Settlement to PwC Settlement Class Members (ECF No. 902) (the “PwC Preliminary Approval Order”).

Today, Lead Plaintiffs filed a motion for preliminary approval of another proposed settlement in the Action; a settlement with the Individual Defendants. The settlement classes covered by the PwC Settlement and the Individual Defendant Settlement are the same. In the interest of judicial economy and efficiency, the schedule proposed to the Court for the new settlement is the schedule previously approved by the Court for the PwC Settlement.¹ Because of the congruence of the settlement classes, in order to avoid unnecessary cost and confusion by sending and publishing two largely duplicative notices, the notices drafted for the Individual Defendant Settlement were drafted to cover both settlements.

The PwC Preliminary Approval Order previously entered by the Court approved and ordered mailing and publication of notices that related only to the PwC Settlement. If the Court grants preliminary approval to the Individual Defendant Settlement, we move the Court, through

¹ Among other things, the schedule previously approved provides for the hearing to determine whether final approval should be granted to be held on November 20, 2015.

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this letter motion, to enter the attached [Proposed] Order Amending PwC Preliminary Approval Order ("Amending Order"), which would amend the PwC Preliminary Approval Order to provide that, in lieu of the previously approved PwC Notice and PwC Summary Notice, the combined PwC/Individual Defendant Notice and PwC/Individual Defendant Summary Notice, attached as Exhibits 1 and 2 to the Amending Order, be disseminated to the PwC Settlement Class in accordance with the provisions of the PwC Preliminary Approval Order. In all other respects, the PwC Preliminary Approval Order will remain unchanged.

Counsel for PwC has reviewed the combined forms of notice and consents to this motion. We appreciate the Court's consideration of this matter.

Respectfully submitted,



Salvatore J. Graziano



Javier Bleichmar *by RFH with permission*

cc: Counsel of record in the Securities Action
(via ECF)

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